

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ENERRA CORPORATION,

Plaintiff,

vs.

CONTI GROUP LLC, PLASTIKGAS LLC,
ROBERTO CONTI, JULIE CONTI, JORDAN
CONTI,

Defendants.

Civil Action No. 3:23-cv-00194-L

CONTI GROUP, LLC,

Counter-Plaintiff,

vs.

ENERRA CORPORATION, SERGIO PEREZ,
MARK MILLS AND MICHAEL BROWN,

Third-Party
Defendants.

**RESPONSE IN OPPOSITION TO THIRD PARTY DEFENDANTS' MOTION TO
DISMISS; REQUEST TO CONDUCT JURISDICTIONAL DISCOVERY;
REQUEST TO AMEND PLEADINGS**

Counter-Plaintiff responds in opposition to Third-Party Defendants' Motion to Dismiss Pursuant to Rule 12(b)(2) for lack of personal jurisdiction. Counter-Plaintiff hereby moves the Court to find that personal jurisdiction exists. Counter-Plaintiff requests permission to conduct jurisdictional discovery. Counter-Plaintiff requests permission to amend pleadings.

In accordance with Local Rule 7.1(d), Counter-Plaintiff submits the accompanying Brief in Support of Response in Opposition to Third-Party Defendants' Motion to Dismiss.

WHEREFORE, PREMISES CONSIDERED, Counter-Plaintiff prays that this Court DENY Third-Party Defendants' Motion to Dismiss, and grant Counter-Plaintiff any further relief, both in law and equity, as the Court deems proper and just.

Dated May 8, 2023

Respectfully submitted,

CRM LAW PLLC

By: /s/ Carrie R. McNair
Carrie R. McNair
Texas Bar No. 24110715

820 S Macarthur Blvd Ste 105-342
Coppell, Texas 75019
850-509-4874 telephone
carriemcnair@crmcnairlaw.com

**ATTORNEY FOR (A) DEFENDANTS CONTI
GROUP LLC, PLASTIKGAS LLC, ROBERTO
CONTI, JULIE CONTI, JORDAN CONTI AND
(B) COUNTER-PLAINTIFF CONTI GROUP,
LLC**

/s/ Brandon Wilson

Brandon Wilson
State Bar No. 24076776
brandonw@hermes-law.com

Peter Kerr
State Bar No. 24076478
peter@hermes-law.com

Hermes Law, P.C.
2550 Pacific Avenue, Suite 700
Dallas, Texas 75201
(214) 749-6800
(214) 749-6801 (Fax)

**ATTORNEYS FOR (A) DEFENDANTS CONTI
GROUP LLC, PLASTIKGAS LLC, ROBERTO
CONTI, JULIE CONTI, JORDAN CONTI AND**

**(B) COUNTER-PLAINTIFF CONTI GROUP,
LLC**

CERTIFICATE OF SERVICE

I certify that all attorneys deemed to accept service of the above-referenced document electronically, which includes all attorneys entitled to receive service of the above-referenced document, will be notified via the Court's CM/ECF system on today's date, May 8, 2023.

By: /s/ Carey R. McNair
Carey R. McNair